

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

UNITED STATES OF AMERICA,)
)
 PLAINTIFF,)
)
 v.)
)
 HINDS COUNTY; HINDS)
 COUNTY BOARD OF SUPERVISORS; AND)
 VICTOR MASON, HINDS COUNTY SHERIFF,)
 IN HIS OFFICIAL CAPACITY,)
)
 DEFENDANTS.)
 _____)

Civil No. 3:16cv489 WHB-JCG

JOINT MOTION FOR ENTRY OF SETTLEMENT AGREEMENT

Plaintiff, United States of America, and Defendants, Hinds County et al., (collectively, “the Parties”) hereby jointly and respectfully request that this Court enter the attached Settlement Agreement (“Agreement”) as an order of the Court. See Attachment 1. The Agreement is reasonable and equitable, and reflects the Parties’ mutual desire to protect the constitutional rights of Hinds County prisoners while avoiding the burdens of contested litigation. The Agreement, if approved, will resolve all of the United States’ claims against Defendants. In support of this motion, the parties submit the accompanying Memorandum in Support of Joint Motion for Entry of Settlement Agreement.

Dated this 23rd day of June, 2016.

Respectfully submitted,

COUNSEL FOR PLAINTIFF, UNITED STATES OF AMERICA:

GREGORY K. DAVIS
U.S. Attorney
Southern District of Mississippi

VANITA GUPTA
Principal Deputy Assistant Attorney General
U.S. Department of Justice
Civil Rights Division

MITZI DEASE PAIGE
Civil Chief
U. S. Attorney's Office
Southern District of Mississippi
501 East Court Street
Suite 4.430
Jackson, MS 39201
(601) 973-2840
Mitzi.Paige@usdoj.gov
MS Bar #6014

STEVEN H. ROSENBAUM
Chief
U.S. Department of Justice
Civil Rights Division
Special Litigation Section
950 Pennsylvania Ave., NW
Washington, DC 20530
(202) 514-5393
Steven.Rosenbaum@usdoj.gov
NY Bar #1901958

/s/ Laura L. Coon
LAURA L. COON
Special Counsel
U.S. Department of Justice
Civil Rights Division
Special Litigation Section
950 Pennsylvania Ave., NW
Washington, DC 20530
(202) 514-1089
Laura.Coon@usdoj.gov
DC Bar # 481379

/s/ Christopher N. Cheng
CHRISTOPHER N. CHENG
Trial Attorney
U.S. Department of Justice
Civil Rights Division
Special Litigation Section
950 Pennsylvania Ave., NW
Washington, DC 20530
(202) 514-8892

(202) 514-4883 (fax)
Christopher.Cheng@usdoj.gov
PA Bar #69066

/s/ Elizabeth C. Kelley
ELIZABETH C. KELLEY
Trial Attorney
U.S. Department of Justice
Civil Rights Division
Special Litigation Section
950 Pennsylvania Ave., NW
Washington, DC 20530
(202) 514-0460
Beth.Kelley@usdoj.gov
VA Bar #80255

COUNSEL FOR DEFENDANTS HINDS COUNTY: HINDS COUNTY BOARD OF
SUPERVISORS; THE HERIFF OF HINDS COUNTY IN HIS OFFICIAL CAPACITY:

/s/ Pieter Teeuwissen
Pieter Teeuwissen
Board Attorney
P.O. Box 686
Jackson, MS 39205-0686
(601) 968-6797
(601) 968-6794 (Fax)
pteeuwissen@co.hinds.ms.us

/s/Claire Barker
Claire Barker
Counsel to the Sheriff
407 East Pascagoula Street
Jackson, MS 39205
(601) 974-2969
(601) 948-2680 (Fax)
cbarker@co.hinds.ms.us

CERTIFICATE OF SERVICE

I hereby certify that on June 23, 2016, I filed the foregoing Joint Motion for Entry of Settlement Agreement with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

LAURA L. COON
Special Counsel
U.S. Department of Justice
Civil Rights Division
Special Litigation Section
950 Pennsylvania Ave., NW
Washington, DC 20530
(202) 514-1089
Laura.Coon@usdoj.gov

CHRISTOPHER N. CHENG
Trial Attorney
U.S. Department of Justice
Civil Rights Division
Special Litigation Section
950 Pennsylvania Ave., NW
Washington, DC 20530
(202) 514-8892
(202) 514-4883 (fax)
Christopher.Cheng@usdoj.gov

ELIZABETH C. KELLEY
Trial Attorney
U.S. Department of Justice
Civil Rights Division
Special Litigation Section
950 Pennsylvania Ave., NW
Washington, DC 20530
(202) 514-0460
Beth.Kelley@usdoj.gov

STEVEN H. ROSENBAUM
Chief
U.S. Department of Justice
Civil Rights Division
Special Litigation Section
950 Pennsylvania Ave., NW
Washington, DC 20530
(202) 514-5393
Steven.Rosenbaum@usdoj.gov

I also certify that I have mailed copies of the foregoing using the United States Postal Service to the following:

COUNSEL FOR DEFENDANTS HINDS COUNTY: HINDS COUNTY BOARD OF SUPERVISORS; THE SHERIFF OF HINDS COUNTY IN HIS OFFICIAL CAPACITY:

Pieter Teeuwissen
Board Attorney
P.O. Box 686
Jackson, MS 39205-0686
(601) 968-6797
(601) 968-6794 (fax)
pteeuwissen@co.hinds.ms.us

Claire Barker
Counsel to the Sheriff
407 East Pascagoula Street
Jackson, MS 39205
(601) 974-2969
(601) 948-2680 (Fax)
cbarker@co.hinds.ms.us

DATE: June 23, 2016

/s/ Mitzi Dease Paige
MITZI DEASE PAIGE
Civil Chief
U. S. Attorney's Office
Southern District of Mississippi
501 East Court Street
Suite 4.430
Jackson, MS 39201
(601) 973-2840
Mitzi.Paige@usdoj.gov
MS Bar #6014